

REMARKS

In the Office Action mailed from the United States Patent and Trademark Office on September 26, 2005, the Examiner rejected Claims 1-12 and 18-23 under 35 U.S.C. §102(e) as being anticipated by Siegel et al. (2002/0046049). Accordingly, Applicant respectfully provides the following.

Claim Rejections under 35 U.S.C. §102(e).

In the Office Action, the Examiner rejected claims 1-12 and 18-23 under 35 U.S.C. 102(e) as being anticipated by Siegel et al. (hereinafter Siegel) U.S. Publication 2002/0046049. In response, Applicant amended independent claims 1, 11, 18 and 20 and provides the following remarks. The standard for a Section 102 rejection is set forth in M.P.E.P 706.02, which provides:

[F]or anticipation under 35 U.S.C. 102, the reference must teach every aspect of the claimed invention either explicitly or impliedly. Any feature not directly taught must be inherently present.

Applicant respectfully submits that the cited reference does not teach every aspect of the claimed invention. Applicant's amendments to independent claims 1, 11, 18 and 20 further clarify the present invention's differences from Siegel. In these claims, Applicant added the limitation of sending a request to a collection agency to collect on an unpaid debt. Applicant did so to highlight the fact that while Siegel teaches a single-entity collection method, the present invention contemplates a multi-entity collection method. For instance, Siegel teaches that "Customer Service Representatives (CSRs) are employed by banks and other companies to

handle inquiries by account holders regarding their accounts, and to contact account holders regarding market promotions, delinquent accounts and other programs. *See Siegel, page 1, paragraph 0003.* In addition, Siegel teaches that when “contacting delinquent account holders . . . CSRs are often directed to try to obtain a promise from the account holders to pay a certain amount of the balance due. *See Siegel, page 1, paragraph 0004.* Siegel continues that “large banks and other organizations may spend significant resources, sometimes millions of dollars per year, to staff and employ CSRs around the clock in such concerted service and collection efforts, at call centers, Web centers and other facilities.” *See Siegel, page 1, paragraph 0005.* Siegel continues that it is difficult to measure the effectiveness and productiveness of such collection efforts. *Id.* Siegel also notes that an important aspect of its invention is to allow managers to construct their collection efforts such that it helps their organization reach its goals. *See Siegel, page 2, paragraph 00017.* Thus, it is evident that Siegel contemplates usage only within a single-entity.

In contrast, the present invention claims the limitation of sending a request to a collection agency to collect on an unpaid debt. In addition, the present invention’s discussion of engaging letter writing services (see page 17 of Specification) and voucher program (see page 21, line 21 – page 22, line 10 of Specification) show the present invention’s contemplation of multi-entity collection methods.

Therefore, because the amended claims now further clarify the differences between the present invention and Siegel, Applicant respectfully submits that the cited reference does not

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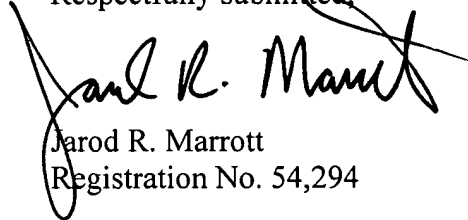
teach every aspect of the claimed invention. Consequently, Applicant respectfully requests the withdrawal of the Examiner's rejection under 35 U.S.C. § 102(e).

CONCLUSION

If any impediments to the allowance of this application for patent remain after the above amendments and remarks are entered, the Examiner is invited to initiate a telephone conference with the undersigned attorney of record.

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Respectfully submitted,



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